

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

Civil Action No. 3:17-01362

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*  
Defendants.

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CABELL COUNTY COMMISSION,  
Plaintiff,

v.

Civil Action No. 3:17-01665

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*  
Defendants.

**PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION OF  
DAVID G. CHAFFIN, JR.**

PLEASE TAKE NOTICE that pursuant to the applicable Federal Rules of Civil Procedure and all other orders and rules governing this litigation, Plaintiffs, by and through undersigned counsel, will take the oral videotaped deposition of **David G. Chaffin, Jr.**, on **July 29, 2020** at **9:00 AM remotely**. Attached hereto as Exhibit 1 is a copy of an amended subpoena to David G. Chaffin, Jr. for attendance at the deposition.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court

reporting services and video recording services will be provided by Golkow Global Litigation Services. Parties who wish to attend may RSVP to the deposition by emailing [scheduling@golkow.com](mailto:scheduling@golkow.com).

Dated: July 27, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

/s/ Anne McGinness Kears

Anne McGinness Kears (WVSB No. 12547)

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CABELL COUNTY COMMISSION

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 27, 2020, the PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION OF DAVID G. CHAFFIN, JR. was served on all counsel via email only to plaintiffs' listserv at [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com) and defendants' listservs at [track2opioidddefendants@reedsmith.com](mailto:track2opioidddefendants@reedsmith.com).

/s/ Monique Christenson  
Monique Christenson (SC Bar No. 104063)  
**MOTLEY RICE LLC**